

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Case No.: 18-20071

Plaintiff,

v

Hon. Stephen J. Murphy, III

D-1 LERON LIGGINS,

Defendants.

DEFENDANT LERON LIGGINS' SENTENCING MEMORANDUM

Pursuant to §3553 of Title 18, Defendant prays that this Honorable Court impose a sentence sufficient, but not greater than necessary, in compliance with the purposes set forth in subsections (a)(2)(A)-(D).

Mr. Liggins has been in custody for over four years now through the entirety of the Covid pandemic and has had a remarkable work ethic at the Milan Federal Detention Center. He has not required any discipline; he has a close loving family; is his parents only child; has already learned the basic skills to work with his father in a successful and essential trade; can be taught the skills to achieve a state license as a journeyman electrician; can serve his mandatory minimum five year sentence at the Milan Federal Correctional Institution, which has a facility for construction trades; can continue to be close to his family during his remaining sentence; and can get back to work immediately upon release.

Four years of dedicated supervised release would be an ideal chance to advance his status as an electrician with full-time employment and earn his way back into society while under the supervision of this Court's Probation Department.

As the letters to this Honorable Court indicate, the opportunity to go back to a trade where he has been respected exists as his dedicated family has laid the foundation.

Reflecting back on Mr. Liggins' four years before this Court, it is apparent that poor decisions were made. Most recently, the decision to reject the plea offer proposed and presented on the eve of jury selection which had a floor of 70 months.

However, the plea offer was rejected after Mr. Liggins' evaluation of a desire for a jury trial, a decision which should not bear on punishment.

Mr. Liggins was tried and convicted by the jury after a very short deliberation and the defense moved for a new trial which was summarily denied - - again, a legitimate procedural due process.

Mr. Liggins now stands before this Court at a crossroads of life. He is 34 years old and can choose a legitimate career which is available by the goodness of a loving family.

His talents as an electrician and his work ethic are outstanding, and his father can attest.

His parents are his bedrock foundation. His father was present every day of trial, as was his mother; however she chose to avoid the verdict.

His father's business "Force One Electric" is very successful, very busy and in need of talent.

Mr. Liggins also had drug issues in his youth, and beyond, which lead to poor decisions, and a residential drug program could also benefit him.

The State Licensing and Regulatory Agency has strict mandates for electrician licenses which Mr. Liggins' father would have the ability to orchestrate through his business as Defendant qualifies at various stages on the way to a master electrician's license. The process would take several years and, of course, Mr. Liggins, who just turned 73, would monitor that as well as he can. He has no intention to retire immediately or in the near future. He's busy, he loves his work, he enjoys his work, and would be ecstatic to have his son on board through the process of his supervised release.

Respectfully submitted,

CLARK HILL PLC

By: /s/ Martin E. Crandall
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Date: March 21, 2022

CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2022, my secretary electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all of the parties of record.

/s/ Martin E. Crandall

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